UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
825 Jadwin Avenue Suite 210
Richland, Washington 99352

November 18, 2018

Ref: ECL-122

Jason Maughan
Monsanto Chemical Company
1853 Idaho 34
Soda Springs, ID 83276

VIA ELECTRONIC MAIL ONLY

Re: Comments on Conceptual Water Management Plan for Humble Springs

Dear Mr. Maughan,

EPA and IDEQ have reviewed and are providing these comments related to the Conceptual Water Management Plan for Humble Spring dated September 20, 2018.

Specific Comments

Table 1, Page 2 It is noted that the Table lists the molybdenum concentration at the Humble Spring on June 2, 2017 as 0.130 mg/L, but the Figure 24 and Table 9b of the *2017 Summary Report On Groundwater Conditions, Monsanto Company Soda Springs, Idaho Plant* (Golder Associates Inc., May 2018) presents the concentration as 0.013 mg/L. Please reconcile the discrepancy. Also, please indicate in the table if the metals are dissolved or total concentrations.

Section 1.1, Page 3 The document states that water from Humble Spring meets the remediation goals for the constituents of concern presented in Table 1, as specified in the Record of Decision of 1997. That does not seem to be the case for manganese in the June 2, 2017 sample. The *2017 Summary Report On Groundwater Conditions, Monsanto Company Soda Springs, Idaho Plant* (Golder Associates Inc., May 2018) states in Table 3 on page 2 that the remediation goal for this site for manganese is 0.18 mg/L. The concentration of manganese in the water sample collected from Humble Spring on June 2, 2017 was 0.291 mg/L, which is above the remediation goal 0.18 mg/L. It is recognized that the average manganese concentration of all three samples is below the remediation goal. Please revise the text.

Section 2.3, Page 4 It is recommended that a monitoring checklist sheet be prepared and included as an appendix to this plan. The checklist should include all the observations an inspector will need to note, such as existence of standing water, new vegetation, and also a place where any repairs completed to the spring box can be recorded.

Figure 1 It is noted that the topography in the proposed infiltration area is sloping to the southeast which would drive the surface water off the property. It is agreed that the proposed berm should be able to avoid that occurrence.

If you have questions or concerns, please contact me at (206) 553-2589 or by email at cerise.kathryn@epa.gov.

Sincerely,

Kathryn S. Cerise

Kathryn Cerise
Remedial Project Manager